

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

BRANDON RAYMOND BROWN,                     )  
   )  
          Plaintiff,                                 )  
   )  
v.   ) CIVIL ACTION NO. 1:19-CV-358-ECM-WC  
   )  
LT. KING, et al.,                                 )  
   )  
          Defendants.                                 )

**DECLARATION OF SHARON KING**  
**PURSUANT TO 28 U.S.C. § 1746**

STATE OF ALABAMA                             )  
   )  
COUNTY OF HOUSTON                         )

1.       My name is Sharon King. I am over the age of nineteen and am competent to make this declaration, which is based on my personal knowledge, training and experience.

2.       I am employed by the Houston County Sheriff as a Corrections Deputy in the Houston County Jail. I have attained the rank of Lieutenant. I have been employed in this position during the Plaintiff's incarceration in the Houston County Jail.

3.       I deny the allegations made against me by Plaintiff as being untrue and completely without basis in law or fact. I deny that I acted, or caused anyone to act, in such a manner as to deprive the Plaintiff of any right to which he was entitled. Specifically, I deny that Plaintiff has been housed in unconstitutional conditions or deprived of any rights guaranteed to him by the U.S. Constitution.

4. The Houston County Sheriff's Office operates the Houston County Jail according to a written set of policies and procedures which govern the conduct of persons employed at the jail.

5. All deputies at the Houston County Jail are charged with the responsibility of reporting infractions by fellow deputies and reporting any problem to the senior deputy present immediately upon learning of the problem.

6. I had no indication that my jail training, policies, procedures or supervision were likely to result in violations of an inmate's constitutional rights. There is no history of abuse by correctional officers or medical staff in the Houston County Jail.

7. The Houston County Jail has a grievance policy for inmates to express complaints. When an inmate has a grievance the inmate may submit a grievance to jail staff. Inmates use a kiosk to submit grievances and other types of communication to jail staff. If a kiosk is not functioning, inmates are provided with paper forms to communicate with jail staff. A grievance will be promptly investigated and answered by a member of jail staff. Most grievances are answered by the grievance deputy. Grievances of an emergency nature may be made orally and are handled immediately. No negative action will be taken against an inmate as a result of filing a grievance. If an inmate is dissatisfied with the response to the grievance, he or she may appeal in writing up the chain of command to the Sheriff.

8. A copy of the Houston County Jail Inmate Rulebook, which contains instructions for submitting a grievance and other jail rules, is issued to each inmate as part of the booking process. Inmates, including Plaintiff, are well aware of the grievance procedures in place in the Houston County Jail.

9. To my knowledge, the Plaintiff did not submit a grievance regarding the allegations contained in this lawsuit other than the length of kitchen shifts. I have never received an appeal from the Plaintiff regarding any grievance that he has filed. I never refused to accept a grievance or an appeal from the Plaintiff. Thus, Plaintiff has failed to follow the grievance procedure in place at the Houston County Jail.

10. In approximately April 2019 I entered the jail kitchen and was informed by inmate workers that a snake had been seen in the part of the kitchen where seldom used equipment was stored. The inmates stated that the snake had crawled under the bean kettle. I checked the bean kettle and did not see a snake. I did not receive any report that a snake scared, touched or harmed an inmate or a member of jail or Trinity staff. At this time a seldom used bean kettle, deep fryer and serving line were stored in one part of the kitchen. Most likely, these items had food or moisture residue and dark hiding places that were attractive to a snake. Per Houston County Sheriff's Office policy, I notified Commander Brazier of this report and contacted the County Maintenance Department.

11. After this snake was seen inmate workers were not stationed near this equipment.

12. On occasion inmate workers have worked in a twelve hour shift due to worker shortages caused by an inmate being unable to work or being released or transferred from the jail. No matter the shift length, inmate workers are provided with adequate breaks.

13. Had the Plaintiff stated that he did not want to work in the kitchen due to a snake he would not have been subject to lockdown. He would have been transferred to

another inmate worker position if a position was available. If a position was not available, he would have been moved back to population.

14. Inmates at the Houston County Jail are issued slides as footwear. Kitchen workers are given rubber boots to wear in the kitchen due to the amount of water involved in working in the kitchen.

15. The commercial dishwasher at the Houston County Jail was used for rinsing purposes during Plaintiff's incarceration. Kitchen workers washed dishes in a three-step process which involves washing trays by hand with a dishwashing soap and then sterilizing trays by hand with either a bleach or other solution. The trays are then rinsed in the dishwashing machine. Trinity kitchen workers oversee all kitchen inmate workers. The dishwashing machine has been serviced multiple times by an outside contractor. The dishwashing process was implemented to get the best results from the dishwashing machine and extend the operating life of the machine.

16. Houston County Jail serves a hot breakfast, a hot lunch and a hot dinner. Meals meant to be served hot are not intentionally served cold at the Houston County Jail. Every effort is made to serve food in a timely manner at the optimal temperature.

17. The Houston County Jail passes inspections from the Health Department, from the Grand Jury and from the Federal Marshals.

18. Jail records establish that Plaintiff suffered no unconstitutional treatment while confined at the Houston County Jail.

19. I declare under penalty of perjury that the foregoing is true and correct. I further declare that I am competent to make this declaration, and that the above statements were made by drawing from my personal knowledge of the situation.

Executed on this the 21<sup>st</sup> day of November, 2019.

Sharon King  
SHARON KING